

(1)

*SAK 701
9/7/88
Sf*

Mapco Conference Call -

Randy Jones
Chris Voly.

expressed concerns about permitting process.

- agree to pay \$0,000 penalty not an issue.
- remove wastes from Lagoon B.
- honeyard clean up.
- cleanup standards.
- BTEX - already cleaning up groundwater under state program.
- not of the materials handled as characteristic wastes.
- constituents put into sump. have never shown up.

Chris Voly.

order retroactively makes it a TSD.

evaluation of case law. → facility routinely handle.

*INTERFERED
ADVISED*

go thru closure

→ few cases where must go the closure.

IMAGED

facility was not engaged in routine management of hazardous waste.

FILE COPY

(2)

- penalty.
 - have facility do an assessment + cleanup.
 - discussion with state.
 - EPA position . regulatory liability is there
 - go with RCRA or litigate.
 - closure plan.
 - get into closure position + equivalency demonstrations.
before permit position.
- what parameters. or constituents need to be cleaned up.

don't challenge RCRA authority.

don't want to be part of universe.

effective background -
or health + human impact -

↓ constituents
TOX, TOC.
not possible to show what came from.

3008(h). -

(3.)
pump & treat hazardous pond →

3008(h) - covers all reg unit. →
↓
corrective ^{action} unit
covers entire facility.

EPA program. with state assistance.

will look at ACL's. from other cases for evaluation of
equivalency demonstration.

~~for~~ joint 3008(h) + 3008(a) order.

- MAPCO

- Tank 192 → clean closure

- Bore gash → clean closure

-umps → sampling monitoring - overall concept looks
adequate as discussed

8/1/88

- Surface impoundment → can incorporate state order into
an agreement
want to limit constituents sampled for.

- Reverse closure plans.

- Have to be able to show if constituents were released from
the surface impoundment

- If can't show this end up with a requirement for
post closure.

- Analysis show presence of BTEX for Lagoon B.

- Contend that clean closure has been achieved in Lagoon B.